IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

PETER M. GALLIGAN,

Plaintiff,

Case No. 1:17-cv-06310

v.

Hon. Joan H. Lefkow

ADTALEM GLOBAL EDUCATION INC., et al.,

Defendants.

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT FOR THEIR REPLY IN SUPPORT OF THEIR MOTION TO DISMISS PLAINTIFF'S THIRD AMENDED COMPLAINT

Defendants Adtalem Global Education Inc. (ATGE), Adtalem Global Health, Inc. (AGH), and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited (Ross or RUSVM) (collectively, "Defendants") respectfully move for leave to exceed the page limit for their Reply in Support of Their Motion to Dismiss Plaintiff's Third Amended Complaint. In support of this unopposed request, Defendants state as follows:

- On February 4, 2019, the Court granted in part and denied in part
 Defendants' motion to dismiss Plaintiff's Second Amended Complaint. (ECF No. 48.)
- Plaintiff filed his Third Amended Complaint on March 11, 2019. (ECF No. 57.)
- 3. Defendants filed a motion to dismiss the Third Amended Complaint on April 8, 2019. (ECF No. 62.)

- 4. On May 31, 2019, Plaintiff moved for leave to exceed the page limit in his response to Defendants' Motion to Dismiss Third Amended Complaint. (ECF No. 66.)
- 5. The Court grated Plaintiff's request for leave to exceed the page limit on June 3, 2019 (ECF No. 68), and Plaintiff filed his twenty-five page response to Defendants' Motion to Dismiss the Third Amended Complaint on June 5, 2019. (ECF No. 69.)
- 6. Defendants' reply in support of their motion to dismiss is due June 21, 2019. (ECF No. 65.)
- 7. As discussed in Plaintiff's prior motion to exceed the court's page limit,
 Defendants' have moved to dismiss all five of the claims in Plaintiff's Third
 Amended Complaint (with the exception of those claims expressly allowed to
 proceed as stated in the Court's Order following Defendants' motion to dismiss
 Plaintiff's Second Amended Complaint).
- 8. To sufficiently reply to the arguments raised in Plaintiff's opposition to that motion, Defendants' respectfully request leave to file a brief exceeding the 15-page limit set forth in Local Rule 7.1.
- 9. Specifically, Defendants seek to file a reply brief not to exceed twenty pages.
- 10. Should leave be granted, Defendants will comply with Rule 7.1's requirements to include "a table of contents with the pages noted and a table of cases."

- 11. Defendants make this request in good faith, to afford them the opportunity to fully reply to Plaintiff's arguments.
- 12. The parties conferred about Defendants' request for additional pages prior to filing of this motion, and Plaintiff does not oppose Defendants' request.

WHEREFORE, Defendants respectfully request that the Court grant them leave to exceed the court's page limits, and file a Reply in Support of Their Motion to Dismiss Plaintiff's Third Amended Complaint not to exceed twenty pages.

DATED: June 17, 2019 Respectfully submitted,

ADTALEM GLOBAL EDUCATION INC.; ADTALEM GLOBAL HEALTH, INC.; ROSS UNIVERSITY SCHOOL OF MEDICINE SCHOOL OF VETERINARY MEDICINE (ST. KITTS) LIMITED

By: s/Megan Troy

Brian Stolzenbach

<u>bstolzenbach@seyfarth.com</u>

Megan E. Troy

<u>mtroy@seyfarth.com</u>

Thomas M. Horan

<u>thoran@seyfarth.com</u>

SEYFARTH SHAW LLP

233 S. Wacker Drive, Suite 8000

Chicago, IL 60606

Telephone: (312) 460-5000 Facsimile: (312) 460-7000

CERTIFICATE OF SERVICE

I do hereby certify that I have caused a true and correct copy of the foregoing by filing a copy with the Court's CM/ECF system, which will send notification to the following, on this 17th day of June, 2019:

Michael W. Ford, Esq. Law Offices of Michael W. Ford 4 Timberwood Lane Riverwoods, IL 60015 mfordski@aol.com

Emil T. Bayko Ali Henderson Porter Hedges LLP 1000 Main Street, 36th Floor Houston, Texas 77002 tbayko@porterhedges.com